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BEFORE THE ARIZONA CORPORATION COMMISSION

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Commissioner

Arizona Corporation Commission

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IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
§ 271 OF THE TELECOMMUNICATIONS
ACT OF 1996

Docket No. T-00000A-97-0238

NOTICE OF FILING DAILY USAGE
FILE (DUF) TESTING FINAL
REPORT

On June 8, 2004, pursuant to Decision No. 66224, Qwest Corporation ("Qwest") submitted its Daily Usage File ("DUF") supplemental test plan. By Notice dated July 15, 2004, the Commission Staff filed a copy of the DUF provisioning test plan and served it on all parties of record to this proceeding. Pursuant to the Procedural Order issued in this docket on August 19, 2004, any interested parties were directed to file written comments on the test plan by August 27, 2004. No comments were received. After consultation with the Commission Staff, Qwest moved forward with the implementation of the filed test plan. The plan included Qwest's commitment to file the Test Administrator's Report with the Commission on December 14, 2004. Qwest requested a one-week delay in filing to complete limited retesting as described below.

The DUF test has been successfully completed, and the Test Administrator's Report is attached as Appendix A. The results of the test demonstrate a 99.6% DUF record accuracy level. The test utilized a two-prong methodology, which evaluated both the creation and delivery of DUF records for accounts in service (static test) and the accuracy of records for accounts that were newly created or which were subjected to a

1 variety of service order changes (dynamic test) during the course of the examination. The
2 static test involved over 1,500 individual calls and record matches, and the dynamic test
3 included over 3,500 separate calls. No issues were identified in the static test. One
4 hundred percent of those DUF records were correctly generated. Only one system
5 problem was identified from the dynamic portion of the test. This issue affected 18
6 records out of the 3,500+ transactions. That problem was limited to certain orders
7 involving a customer number change on UNE-P accounts and resulted in a two to five day
8 gap when some calls involving that changed number would not have DUF records created.
9 Qwest has completed an analysis of the underlying problem and has commenced the
10 necessary requirements definition and Information Technologies systems work to make
11 appropriate changes to the Pending Order File so DUF records will begin to be
12 immediately created and associated with the account upon completion of the number
13 change service order. Qwest will advise the Commission Staff upon the completion of the
14 necessary systems work.

15 Separately, during the dynamic portion of the test, a total of 33 calls that were
16 expected to create a DUF record initially failed to do so because of an order writing error
17 unique to conducting this DUF test. Upon discovery of this problem, the line change
18 orders were rewritten correctly, and this portion of the DUF test was rerun. One hundred
19 percent of these retest calls produced accurate DUF records. As reflected in the Test
20 Report, for all test calls expected to produce a DUF record over 98.5% did so, and for the
21 total of over 5,000 DUF test calls, the Qwest systems produced the expected DUF results
22 for over 99.6% of all calls.

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1 RESPECTFULLY SUBMITTED this 21st day of December, 2004.

2 FENNEMORE CRAIG

3 BY 

4 Timothy Berg
5 Theresa Dwyer
6 3003 N. Central Avenue, Suite 2600
7 Phoenix, AZ 85012-2913
8 (602) 916-5421

9 -and-

10 Norm Curtright
11 Qwest Corporation
12 4041 N. Central Avenue, 11th Floor
13 Phoenix, AZ 85012
14 *Attorneys for Qwest Corporation*

15 ORIGINAL and 13 copies hand-delivered for
16 filing this 21st day of December, 2004 to:

17 Docket Control
18 ARIZONA CORPORATION COMMISSION
19 1200 W. Washington St.
20 Phoenix, AZ 85007

21 COPY of the foregoing hand delivered
22 this 21st day of December, 2004 to:

23 Maureen A. Scott
24 Legal Division
25 ARIZONA CORPORATION COMMISSION
26 1200 W. Washington St.
Phoenix, AZ 85007

Ernest G. Johnson, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

1 Lyn Farmer, Chief Administrative Law Judge
2 Jane Rodda, Administrative Law Judge
3 Hearing Division
4 ARIZONA CORPORATION COMMISSION
5 1200 W. Washington
6 Phoenix, AZ 85007

7 COPY of the foregoing mailed
8 this 21st day of December, 2004 to:

9 Eric S. Heath
10 SPRINT COMMUNICATIONS CO.
11 100 Spear Street, Suite 930
12 San Francisco, CA 94105

13 Thomas Campbell
14 LEWIS & ROCA
15 40 N. Central Avenue
16 Phoenix, AZ 85004

17 Joan S. Burke
18 OSBORN MALEDON, P.A.
19 2929 N. Central Ave., 21st Floor
20 PO Box 36379
21 Phoenix, AZ 85067-6379

22 Thomas F. Dixon
23 WORLDCOM, INC.
24 707 N. 17th Street #3900
25 Denver, CO 80202

26 Scott S. Wakefield
RUCO
1110 West Washington, Suite 220
Phoenix, AZ 85007

Michael M. Grant
Todd C. Wiley
GALLAGHER & KENNEDY
2575 E. Camelback Road
Phoenix, AZ 85016-9225

1 Michael Patten
2 ROSHKA, HEYMAN & DEWULF
3 400 E. Van Buren, Ste. 900
4 Phoenix, AZ 85004-3906
5
6 Mark DiNunzio
7 COX COMMUNICATIONS
8 20402 North 29th Avenue
9 Phoenix, AZ 85027-3148
10
11 Daniel Waggoner
12 DAVIS, WRIGHT & TREMAINE
13 2600 Century Square
14 1501 Fourth Avenue
15 Seattle, WA 98101
16
17 Traci Grundon
18 DAVIS, WRIGHT & TREMAINE
19 1300 S.W. Fifth Avenue
20 Portland, OR 97201
21
22 Letty Friesen
23 AT&T Law Department
24 1875 Lawrence Street, #1575
25 Denver, CO 80202
26
27 Diane Bacon, Legislative Director
28 COMMUNICATIONS WORKERS OF AMERICA
29 5818 N. 7th St., Ste. 206
30 Phoenix, AZ 85014-5811
31
32 Philip A. Doherty
33 545 S. Prospect Street, Ste. 22
34 Burlington, VT 05401
35
36 W. Hagood Bellinger
37 4969 Village Terrace Drive
38 Dunwoody, GA 30338

1 Joyce Hundley
2 U.S. DEPARTMENT OF JUSTICE
3 Antitrust Division
4 1401 H Street N.W. #8000
5 Washington, DC 20530
6
7 Andrew O. Isar
8 TELECOMMUNICATIONS RESELLERS ASSOC.
9 4312 92nd Avenue, NW
10 Gig Harbor, WA 98335
11
12 Raymond S. Heyman
13 ROSHKA, HEYMAN & DEWULF
14 400 N. Van Buren, Ste. 800
15 Phoenix, AZ 85004-3906
16
17 Thomas L. Mumaw
18 SNELL & WILMER
19 One Arizona Center
20 Phoenix, AZ 85004-0001
21
22 Mike Allentoff
23 GLOBAL CROSSING SERVICES, INC.
24 1080 Pittsford Victor Road
25 Pittsford, NY 14534
26
27 Michael Morris
28 Allegiance Telecom of Arizona, Inc.
29 505 Sansome Street, 20th Floor
30 San Francisco, CA 94111
31
32 Gary L. Lane, Esq.
33 2929 N. 44th Street, Suite 120
34 Phoenix, AZ 85018-7239
35
36 Kevin Chapman
37 SBC TELECOM, INC.
38 1010 N. St. Mary's, Room 1234
39 San Antonio, TX 78215-2109
40

1 Richard Sampson
2 Z-TEL COMMUNICATIONS, INC.
3 601 S. Harbour Island, Ste. 220
4 Tampa, FL 33602
5
6 Megan Doberneck
7 COVAD COMMUNICATIONS COMPANY
8 7901 Lowry Boulevard
9 Denver, CO 80230
10
11 Richard P. Kolb
12 Vice President of Regulatory Affairs
13 ONE POINT COMMUNICATIONS
14 Two Conway Park
15 150 Field Drive, Ste. 300
16 Lake Forest, IL 60045
17
18 Attorney General
19 OFFICE OF THE ATTORNEY GENERAL
20 1275 West Washington
21 Phoenix, AZ 85007
22
23 Steven J. Duffy
24 RIDGE & ISAACSON, P.C.
25 3101 North Central Ave., Ste. 1090
26 Phoenix, AZ 85012
27
28 Karen Clauson
29 ESCHELON TELECOM
30 730 Second Avenue South, Ste. 1200
31 Minneapolis, MN 55402
32
33 Curt Huttshell
34 State Government Affairs
35 Electric Lightwave, Inc.
36 4 Triad Center, Suite 200
37 Salt Lake City, UT 84180
38
39
40
41
42

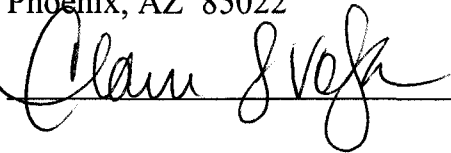
1 Brian Thomas
2 Time Warner Telecom, Inc.
3 223 Taylor Avenue North
4 Seattle, WA 98109

5 David Kaufman
6 ESPIRE Communications
7 1129 Paseo De Peralta
8 Santa Fe. NM 87501

9 Mitchell F. Brecher
10 Greenberg Traurig, LLP
11 800 Connecticut Avenue, NW
12 Washington, DC 20006

13 Tobin Rosen
14 Principal Asst. City Attorney
15 Office of the Tucson City Attorney
16 255 W. Alameda- Seventh Floor West
17 Tucson, AZ 85701

18 Patrick A. Clisham
19 AT&T Arizona State Director
20 320 E. Broadmoor Court
21 Phoenix, AZ 85022

22 
23 _____

24 1619299.4/67817.150
25
26

APPENDIX A

**Daily Usage File (DUF)
Testing**

FINAL REPORT

Prepared For

The Arizona Corporation Commission

By

**V.B. Howard & Associates, LLC
Test Administrator**

December 17, 2004

V.B. Howard & Associates, LLC

I. Introduction

Daily Usage File (DUF) Testing, as mandated by the Arizona Corporation Commission (ACC), was an analysis of Qwest's DUF processing to evaluate Qwest's ability to accurately deliver to Competitive Local Exchange Carriers (CLECs) appropriate usage records in the proper industry format per Exchange Message Interface (EMI) guidelines and the information contained within Qwest's wholesale website.

The DUF contains records that provide details of calls that are originated from, billed-to, and, in the case of terminating access, are terminated to telephone numbers in the Qwest network that have been provided to CLECs either via a resale or unbundled network element-platform (UNE-P) arrangement. This usage is recorded by Qwest on Qwest switching equipment, collected and identified as belonging to a CLEC, translated into EMI format, and then delivered to CLECs via the selected delivery option.

II. Test Scenarios

The DUF testing utilized a variety of ordering and calling scenarios as shown in Tables 1 and 2.

Table 1 - Test Ordering Scenarios¹

Basic Scenario	Res POTS	Bus POTS	Centrex	UNE POTS
Migration from Qwest	X	X	X	X
Resale CLEC to Resale CLEC Migration	X	X		
New Customer	X	X		X
Telephone Number Change	X	X		X
Disconnect (full and partial)	X	X		X
Resale to UNE-P Migration				X

¹ As presented to the ACC in DUF RETEST PLAN FOR ARIZONA CORPORATION COMMISSION - April 2004 (PowerPoint).

Table 2 - Test Calling Scenarios

Scenario	Type of Call
1	Local - direct dialed
2	Local - operator handled
3	Busy Verification
4	Busy Interruption
5	Pay-per-Use Features
6	Directory Assistance - 411 - no call completion
7	Directory Assistance - 411 - with call completion
8	Directory Assistance - NPA-555-1212 - no call completion
9	Directory Assistance - NPA-555-1212 - with call completion
10	IntraLATA - direct dialed - per LPIC
11	IntraLATA - direct dialed - alternate carrier (10XXX)
12	IntraLATA - operator handled
13	IntraLATA - alternately billed
14	InterLATA - direct dialed - per LPIC
15	InterLATA - direct dialed - alternate carrier (10XXX)
16	InterLATA - direct dialed - toll free
17	InterLATA - direct dialed - international
18	InterLATA - carrier directory assistance
19	InterLATA - terminating calls to test lines

III. Test Demographics

Table 3 details the central offices where test lines were placed for DUF testing purposes.

Table 3 - DUF Testing Locations

EO CLI	Switch Type	Address
PHNXAZMADS1	DMS	211 W. Monroe, Phoenix, AZ 85003-1615
PHNXAZMADS4	5E	211 W. Monroe. Phoenix, AZ 85003-1615
TCSNAZMADS1	5E	126 E. Alameda, Tucson, AZ 85701-1202
TCSNAZFWDS0	DMS	4425 N. Flowing Wells, Tucson, AZ 85705-2323

IV. Test Methodology

Execution of DUF testing required Qwest to establish a test bed of accounts against which test calls were placed. The telephone lines for these accounts were physically provisioned in the locations detailed above in Table 3. An additional retail line was provisioned in each location for communication between each testing field unit and the test control unit.

Testing facilities were established in a secured location at 931 14th Street in Denver, CO to enable the placement of automatically-dialed calls. The test control unit, previously utilized in Section 271 compliance testing, was reactivated and programmed by the Test Administrator with the necessary telephone numbers and test calling scripts for proper DUF testing execution.

Placement of testing field units was completed in late July with the full cooperation of all affected central office staff. Test lines were verified for telephone number accuracy and long distance capabilities by the Test Administrator.

The testing methodology directed by the Test Administrator stipulated that test calls be placed on static test lines with no concurrent service order activity AND test lines with concurrent order activity. The provisioning nature of the test lines required that any subsequent service order activity be carefully administered to avoid unnecessary dispatch activity. As such, this testing methodology required careful coordination of test call placement (automated and manual), service order activity, and monitor/capture of DUF records.

The necessity to validate the equipment and processes planned for the DUF test led to a preliminary run of the test with full auto-dialer execution, limited service order activity, and the capture/delivery of DUF records to the Test Administrator. The results of each component activity, as well as the coordination aspects across all components were carefully evaluated and any necessary changes, primarily to terminating telephone numbers, were made.

Live testing commenced in mid-September and was performed in two increments over a six-week period. These testing increments allowed manageable data sizes to be employed in the evaluation phase of this work and, once again, ensured that the testing components worked as planned. Evaluation required the tripartite analysis of automated/manual call logs, individual DUF records, and service order activity and was completed by the Test Administrator on an event-by-event basis.

V. Test Results

The result for each testing increment is contained in Tables 4 and 5 with the aggregate result contained in Table 6.

Table 4 - Test Increment 1

Category	Count	
Total Number of Test Scripts NOT expected to produce DUF record(s)	1,142	
Total Number of Test Scripts expected to produce DUF record(s)	364	
Total Number of Test Scripts	1,506	
Category	Count	Pct of Total
Total Number of Test Scripts expected to produce DUF record(s) that resulted in matching DUF record(s)	364	100.00%
Total Number of Test Scripts expected to produce DUF record(s) that did not result in matching DUF record(s)	0	0.00%
Total Number of Test Scripts expected to produce DUF record(s)	364	100.00%
Total Number of Test Scripts NOT expected to produce DUF record(s) which did not produce DUF record(s)	1,142	100.0%
Total Number of Test Scripts NOT expected to produce DUF record(s) which produced DUF record(s) in error	0	0.00%
Total Number of Test Scripts NOT expected to produce DUF record(s)	1,142	100.00%
Total Number of Test Scripts which produced the expected results	1,506	100.00%

Table 5 - Test Increment 2

Category	Count	
Total Number of Test Scripts not expected to produce DUF record(s)	2,696	
Total Number of Test Scripts expected to produce DUF record(s)	843	
Total Number of Test Scripts	3,539	
Category	Count	Pct of Total
Total Number of Test Scripts expected to produce DUF record(s) that resulted in matching DUF record(s)	825	97.86%
Total Number of Test Scripts expected to produce DUF record(s) that did not result in matching DUF record(s)	18	2.14%
Total Number of Test Scripts expected to produce DUF record(s)	843	100.00%
Total Number of Test Scripts NOT expected to produce DUF record(s) which did not produce DUF record(s)	2,696	100.00%
Total Number of Test Scripts NOT expected to produce DUF record(s) which produced DUF record(s) in error	0	0.00%
Total Number of Test Scripts NOT expected to produce DUF record(s)	2,696	100.00%
Total Number of Test Scripts which produced the expected results	3,521	99.49%

Table 6 - Aggregate Test Result

Category	Count	
Total Number of Test Scripts not expected to produce DUF record(s)	3,838	
Total Number of Test Scripts expected to produce DUF record(s)	1,207	
Total Number of Test Scripts	5,045	
Category	Count	Pct of Total
Total Number of Test Scripts expected to produce DUF record(s) that resulted in matching DUF record(s)	1,189	98.51%
Total Number of Test Scripts expected to produce DUF record(s) that did not result in matching DUF record(s)	18	1.49%
Total Number of Test Scripts expected to produce DUF record(s)	1,207	100.00%
Total Number of Test Scripts NOT expected to produce DUF record(s) which did not produce DUF record(s)	3,838	100.00%
Total Number of Test Scripts NOT expected to produce DUF record(s) which produced DUF record(s) in error	0	0.00%
Total Number of Test Scripts NOT expected to produce DUF record(s)	3,838	100.00%
Total Number of Test Scripts which produced the expected results	5,027	99.64%

Additionally, the Test Administrator examined the formatting and content of the individual DUF records and found 100% of the DUF records to be in compliance with EMI Guidelines and Qwest's published wholesale documentation².

²Documentation may be found at <http://www.qwest.com/wholesale/clecs/duf.html>.
V.B. Howard & Associates, LLC